

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,
a foreign corporation,

Plaintiff,
MKM

Case No. 2:11-cv-12422-AC-

v.

Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,
MONICA LYNN LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE
ESTATE OF GARY LUPILOFF, DECEASED,

Defendants.

Michael F. Schmidt (P25213)
Harvey Kruse, P.C.
Attorney for Plaintiff
1050 Wilshire Drive, Suite 320
Troy, MI 48084
248-649-7800

John H. Bredell (P36577)
Bredell & Bredell
Attorney for Defendants, William
& Jennifer Keene
119 N. Huron Street
Ypsilanti, MI 48197
734-482-5000

Albert L. Holtz (P15088)
ALBERT L. HOLTZ, P.C.
Attorney for Monica Lupiloff, Nicole Lupiloff
and Nicole Lupiloff Personal Representative
of the Estate of Gary Lupiloff, deceased
3910 Telegraph Road, Suite 200
Representative
Bloomfield Hills, MI 48146
248-593-5000

Geoffrey N. Fieger (P30441)
Jeffrey A. Danzig (P36571)
Attorney for Monica Lupiloff,
Nicole Lupiloff and Nicole
Lupiloff, Personal

of the Estate of Gary Lupiloff,
deceased
19390 West Ten Mile road
Southfield, MI 48075
248-355-5555

DEFENDANTS WILLIAM KEENE & JENNIFER KEENE'S EXHIBIT LIST

1. The Nationwide Life Insurance Company Policy and all related documentation for the same at issue in this action

2. Detailing of Gary Harmon Lupiloff's Creditors Holding Secured and Unsecured Priority Claims.
3. Dishonored Check from Gary Harmon Lupiloff to Defendant William Keene.
4. Gary Harmon Lupiloff Hall of Shame Article.
5. Records, including recorded or written transcripts of proceedings, and pleadings from district courts and circuit courts relating to this action, and any relevant actions, involving Defendant's claims.
6. All relevant medical records pertaining to Gary Harmon Lupiloff, including:
 - a. Beaumont Hospital, Royal Oak
3601 W. 13 Mile Rd.
Royal Oak, MI 48073
(248) 898-5000
 - b. The Royal Oak Fire Department, and Advanced Life Support Emergency Medical Services
7. All relevant federal and state statutes, and local ordinances.
8. All letters, memoranda, documents, pleadings, discovery requests and responses to discovery requests, all deposition transcripts and exhibits in connection with this lawsuit.
9. All learned treatises used or relied upon by any experts in this case, or adopted by adverse witnesses as authoritative, and prior writings and publications of any experts in this case.
10. Prior depositions and written opinions/evaluations of adverse medical and liability witnesses.
11. Any and all statements from individuals that witnessed any event relevant to this lawsuit.
12. Any and all records of any Federal or State agency that maintain documents relevant to Gary Harmon Lupiloff, including but not limited to:
 - a. Internal Revenue Service
 - b. Any and all Bankruptcy Proceeding Documentation on behalf of Gary Harmon Lupiloff
 - c. Any and all Money Judgements against Gary Harmon Lupiloff
 - d. Gary Harmon Lupiloff's Criminal Rap Sheet
 - e. Gary Harmon Lupiloff's Record of Disbarment from the Michigan State Bar

13. Any and all necessary foundation, qualifying, preliminary, rebuttal exhibits, including matters of judicial notice and physical views by fact finders.
14. Jodi Bullinger's Google Calendar printout from Tuesday, July 13, 2010.
15. Healthgrades.com information on location of Dr. Kucera's office
16. Curriculum vitae and reports of all experts, and all factual bases, professional reference materials, statutory charts for reference, visual or graphic items, and every other data used by any listed or referenced expert in support of opinions or conclusions or formulation of the same.
17. All findings and documents of CNS Investigations (or CNSPI).
18. Affidavits, statements, and writings made or adopted by any party or witness.
19. Deposition transcripts of deposed witnesses in this case.
20. All exhibits listed by any party to this action.

Dated: November 7, 2013

Respectfully submitted:

s/John H. Bredell
119 N. Huron Street
Ypsilanti, Michigan 48197
Phone: (734) 482-5000
E-mail: jbredell@bredell.com
P36577

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

s/John H. Bredell
John H. Bredell (P36577)
119 N. Huron Street
Ypsilanti, Michigan 48197
Phone: (734) 482-5000
E-mail: jbredell@bredell.com
P36577